

Exhibit A

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

MODULUS-X PRECISION MACHINING
LTD.,

Plaintiff,

v.

MODTRUSS, INC.,
and DOES 1-10, INCLUSIVE,

Defendants.

Case No. 1:24-cv-04377-ELR

MODTRUSS, INC.,

Counterclaim Plaintiff,

v.

MODULUS-X PRECISION MACHINING
LTD.; KEY RIGGING EQUIPMENT LTD.;
and DEAN COLLINS,

Counterclaim Defendants.

DECLARATION OF DEAN COLLINS

I, Dean Collins, hereby declare as follows:

1. I am the founder of Modulus-X Precision Machining Ltd. (“Modulus-X”), as well as its current owner and president.
2. I am also the current president and owner of Key Rigging Equipment Ltd. (“Key Rigging”).

3. I respectfully submit this declaration in support of the Counterclaim Defendants' Motion to Dismiss ModTruss, Inc.'s ("ModTruss")

Counterclaims in the above-captioned case.

4. I have the authority to make this declaration.

5. I am familiar with the business and types of documents and records that Modulus-X and Key Rigging receive, create, and rely on in the regular course of each respective business.

6. I have decades of experience working as a hands-on technician within the entertainment and sport industries.

7. I have personal knowledge of the facts contained herein and, if called as a witness, I can competently testify that they are true and correct.

8. I am a Canadian citizen who resides in Burnaby, British Columbia, Canada.

9. I maintain no permanent residence within the United States.

10. I have no physical office, mailing address, post office box, or telephone listing in Georgia, nor have I ever owned or rented real property or held personal bank accounts in Georgia.

11. I have never paid taxes to the State of Georgia.

12. In my personal capacity, I have never directed activities at Georgia.

13. I have never traveled to Georgia in my capacity as President of Key Rigging.

14. My involvement in legal matters in the state of Georgia is limited to the case at hand in my capacity as president of Modulus-X. This is the first and only interaction with Georgia's judicial system.

15. I have only traveled to the State of Georgia on two separate occasions to participate in tradeshow in Atlanta. I attended both tradeshow in my capacity as President of Modulus-X.

16. I have never engaged in any regular, continuous, or ongoing relationships in Georgia in my personal capacity or in my capacity as President of Key Rigging.

17. Key Rigging is a Canadian company registered to do business and headquartered in British Columbia, Canada. Key Rigging has been doing business in Canada since 2002.

18. Key Rigging only offers to sell or rent its products in the Metro-Vancouver, Canada area.

19. Attached as Exhibit 1 is a true and accurate copy of the Key Rigging website homepage.

20. Key Rigging does not serve anywhere in the United States and has never done so.

21. Key Rigging does not maintain any offices or employees in the State of Georgia.

22. Key Rigging does not, nor has it ever conducted business in the state of Georgia.

23. Key Rigging does not, nor has it ever paid taxes to the State of Georgia.

24. Key Rigging has never directed any activities or conduct toward Georgia.

25. Key Rigging does not maintain a local listing in telephone or business directories in Georgia.

26. Key Rigging has never engaged in any regular, continuous, or ongoing relationships in Georgia.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 13, 2025, in Burnaby, British Columbia, Canada.

DEAN COLLINS

A handwritten signature in black ink, appearing to read "De Collins", with a stylized flourish at the end.

EXHIBIT 1



3155 Underhill Avenue
Burnaby BC

(604) 568-8801

Mon - Fri: 8:00 - 4:30

[HOME](#)
[MODULUS-X](#)
[MOTORS & TRUSS](#)
[CONTACT](#)


KEY RIGGING EQUIPMENT LTD.

Quality rigging equipment since 2002

Who We Are

Family-owned and operated since 2002, Key Rigging Equipment Ltd. supplies the Vancouver film, TV and special events industries with rigging equipment rental and sales. Our dedicated team works hard to ensure our clients have what they need to finish the job on time and on budget.



Our Equipment

Motors & Truss

Find out about our range of equipment and contact us today for an estimate.

[Learn More](#)

Modulus-X

An elegant temporary structure with the best load ratings and weight-to-strength ratio in the industry.

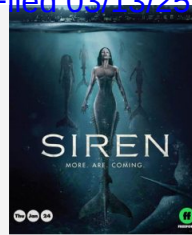
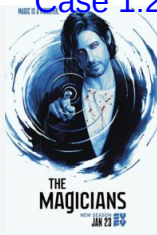
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